

New York
Menlo Park
Washington DC
London
São Paulo

Paris
Madrid
Tokyo
Beijing
Hong Kong



Lawrence E. Jacobs

Davis Polk & Wardwell LLP 212 450 4680 tel
450 Lexington Avenue 212 701 5567 fax
New York, NY 10017 lawrence.jacobs@davispolk.com

May 24, 2021

Re: Notification Pursuant to Rule 1.12 of New York Rules of Professional
Conduct; Francis v. Culley, 1:20 CV 3326 (PKC)

The Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Chen:

I write to provide notice pursuant to Rule 1.12 of the New York Rules of Professional Conduct that we are screening Your Honor's former law clerk, Emma Larson, from any participation in our work relating to a matter that was pending before Your Honor during her clerkship.

Ms. Larson was a law clerk in Your Honor's chambers from April 2020 to April 2021. She will join Davis Polk as an associate on June 1, 2021. We understand that, during her clerkship, a matter in which we are involved was pending before you, Francis v. Culley, 1:20 CV 3326 (PKC) (the "Screened Matter"). We represent respondent Shellon Culley in that matter.

We have established screening procedures to assure that there is no flow of information between Ms. Larson and the Davis Polk team working on the Screened Matter. All firm attorneys and legal assistants working on the Screened Matter will be instructed in writing by email that no person working on the Screened Matter should discuss or share with Ms. Larson any information relating to his or her work on the Screened Matter and that they must not seek any information from Ms. Larson. Similarly, Ms. Larson will be instructed in writing that she is not to share any information she may have about the Screened Matter with anyone at Davis Polk. The instructions will make clear that these restrictions apply to all forms of information sharing, including but not limited to oral discussions, writings, and emails. We will also restrict the files relating to the Screened Matter so that Ms. Larson will not be able to access them. We will send regular reminders of the establishment of this screen to all personnel working on the Screened Matter and to Ms. Larson.

The written screen notification will provide that violations of our screening procedures may result in sanctions.

The Hon. Pamela K. Chen

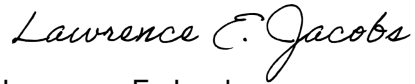
2

May 24, 2021

As an associate, Ms. Larson will be paid a fixed salary, and will not be apportioned any of the fees from the Screened Matter. The determination of any associate bonus amount also will not be related in any way to fees from the Screened Matter.

Please let me know if Your Honor desires further information about the foregoing.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lawrence E. Jacobs".

Lawrence E. Jacobs

cc: All counsel by e-filing

By Electronic Filing